

**P & G CONSTRUCTION
CONSULTANTS LLC, as assignee,**

V.

Defendant.

AFFIDAVIT OF MATTHEW B. ROGERS

6. A copy of the actual invoice entries billed to Penn National for securing the

relief in Penn National's Motion to Compel is attached hereto as **Exhibit 1**.

VERIFICATION

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on: April 10, 2023

Respectfully submitted,

s/Matthew B. Rogers

MATTHEW B. ROGERS

Registration No. 38777

DIRECT: (615) 630-7725

(615) 256-8787, Ext. 121

mrogers@bkblaw.com

**BREWER, KRAUSE, BROOKS & CHASTAIN,
PLLC**

545 Mainstream Drive, Suite 101

Nashville, TN 37228

Attorney for Defendant, Pennsylvania National
Mutual Casualty Insurance Company

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of April, 2023, a true and correct copy of the foregoing **AFFIDAVIT OF MATTHEW B. ROGERS** was filed electronically. Notice of this filing will be sent by operation of the court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U. S. Mail. Parties may access this file through the court's electronic filing system.

Drayton D. Berkley, Esquire
Berkley Law Firm, PLLC
P. O. Box 771048
Memphis, TN 38177

s/Matthew B. Rogers

MATTHEW B. ROGERS

PTC:
MBR:mbr